

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**AFFIDAVIT IN SUPPORT
OF CRIMINAL COMPLAINT AND ARREST WARRANT**

I, **Elizabeth De Jesus**, being duly sworn, depose and state:

INTRODUCTION

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI) assigned to San Juan, Puerto Rico. I have been so employed since September 2004. I am currently assigned to the Puerto Rico Crimes Against Children Task Force (PRCACTF), which conducts a wide variety of investigations of crimes including crimes where computers and the Internet are used in the sexual exploitation of children, including (but not limited to) violations involving producing or trafficking in child pornography (hereinafter “CP”). I have received formal and on-the-job training in the investigation of cases involving the sexual exploitation of children to include training programs, participation in the execution of search and arrest warrants involving child pornography, and participation in warrants involving seizures of computers and other digital storage media.

PURPOSE

2. This Affidavit is made in support of an application for a Criminal Complaint and Arrest Warrant for **Ryan Yared ORTIZ Perez** for violations of 18 U.S.C. §§ 2251(a), 2252(a)(4)(B), and 2422(b).

PARAMETERS

3. The facts set forth in this Affidavit are based on my personal observations and information provided to me by other law enforcement officers and individuals. Because I submit this

Affidavit for the limited purpose of showing probable cause, I have not included each fact that I have learned in this investigation in this Affidavit. Rather, I have set forth only facts sufficient to establish probable cause to issue a Criminal Complaint and Arrest Warrant for **Ryan Yared ORTIZ Perez**. Additionally, unless indicated otherwise, all statements and conversations described herein are relayed in substance and in part only, rather than verbatim.

CHILD PORNOGRAPHY DEFINITIONS

4. 18 U.S.C. § 2256(1), defines “minor” as any person under the age of eighteen years.
5. 18 U.S.C. § 2256(2), defines “sexually explicit conduct” as actual or simulated:
 - a. Sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex;
 - b. Bestiality;
 - c. Masturbation;
 - d. Sadistic or masochistic abuse; or
 - e. Lascivious exhibition of the anus, genitals, or pubic area of any person.
6. 18 U.S.C. § 2256(5), defines “visual depiction” as including undeveloped film and videotape, data stored on computer disk or by electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.
7. For purposes of this affidavit, “child pornography,” as defined by 18 U.S.C. § 2256(8), means any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where – (A) the production of such visual

depiction involves the use of a minor engaging in sexually explicit conduct; . . . [or] (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.” For conduct occurring after April 30, 2003, the definition also includes “(B) such visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaging in sexually explicit conduct.”

8. The term “computer,” as used herein, is defined pursuant to 18 U.S.C. § 1030(e)(1), as “an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device.”

PROBABLE CAUSE

9. On February 12, 2021, Homeland Security Investigations (HSI), Puerto Rico Crimes Against Children Task Force (PRCACTF) received information that two minor males (V-1 and V-2) were coerced to produce sexually explicit material by an unidentified person (TARGET), who claimed to be a female named “Jenny”, utilizing Instagram username https://www.instagram.com/jenisluv_ (2006986386) (TARGET ACCOUNT #1). V-1 and V-2 indicated that the communications with TARGET ACCOUNT #1 happened via Instagram from in or about December, 2020 through on or about February 12, 2021.
10. HSI served a summons request to T-Mobile requesting subscriber information for IPv6 addresses linked to TARGET ACCOUNT #1. In response to the summons, T-Mobile provided the MSISDN/Identifier of the IPv6 addresses as 856-238-2007.

11. On March 4, 2021, a United States Magistrate Judge issued a search warrant for TARGET ACCOUNT #1.

12. The search warrant return listed “jenisluv_” as the old vanity name and “jennixlux_” as the new vanity name. The return contained child sexual abuse material, including sexually explicit photos and videos of V-1 and V-2. Also included was a Portable Document Format (pdf) file with Instagram chats, which included a chat between the TARGET and another Instagram account user (IAU #1) who at times referred to the TARGET as “Ryan”. On February 10, 2021, the TARGET told IAU #1 that he/she had a 5G, iPhone 12 Pro Max, but had poor cell phone reception. IAU #1 stated he did not believe the TARGET. The TARGET decided to make a screen video recording going into his/her phone settings to prove that he/she had an iPhone 12 Pro Max with only “two bars” of phone reception. In doing so, the following information was revealed:

Name: Ryan’s iPhone

Model Name: iPhone 12 Pro Max

Model Number: MG9P3LL/A

Serial Number: G0PDTVMZ0D3Y

13. On March 3, 2021, the TARGET told IAU #1 that he/she was going back to Puerto Rico on April 12. IAU #1 later sent the TARGET a photo of himself and asked if the TARGET liked his beard. The following was their conversation:

TARGET ACCOUNT #1: pero (*but*) I don’t like hairy boys xd

IAU #1: HAJAJAJA. You like kids.

TARGET ACCOUNT #1: Shhh. You too.

IAU #1: Mmmm no tanto como tu (*Mmmm not as much as you*)

[...]

IAU #1: Could you just send me something to get off? :)

Like the kid with eleven?

TARGET ACCOUNT #1: Ummm. Ok give me a sec

The TARGET proceeds to send several sexually explicit videos of males who appear to be minors.

[...]

IAU #1: More kids juntos (*together*)

The TARGET sent a photo of two nude males.

TARGET ACCOUNT #1: My favorite twins

IAU #1: Did you make them fuck?

TARGET ACCOUNT #1: You'll never know

14. The most recent Instagram chat messages between the TARGET and IAU #1 at the time, were briefly seen in the recording, revealing the TARGET was using that iPhone to access TARGET ACCOUNT #1.

15. Also included was a chat between the TARGET and Instagram Account User #2 (IAU #2).

IAU #2 alleged to be 14-years-old. On March 2, 2021, the TARGET asked IAU #2 if he wanted to find out the TARGET's location. TARGET ACCOUNT #1 sent a screen video recording which revealed his/her phone screen, which listed "T-Mobile LTE" on the top left. The recording then revealed the most recent Instagram chat messages they had sent at the moment, revealing the TARGET was using his phone to access TARGET ACCOUNT #1. TARGET ACCOUNT #1 then went into "Maps" and showed his/her location close to Millville, New Jersey.

16. Also contained in the Instagram chats were the TARGET's threats to upload some of his/her victims' sexually explicit material to Twitter account Jennifer Martinez @<http://twitter.com/GraveyardPerez>. Screencaptures of the account show child pornography uploading or already uploaded to the Twitter account. HSI served a summons request to Twitter requesting subscriber information for the Twitter account. In response, Twitter provided the following email address associated to the Twitter account - yoriad123@gmail.com.

17. On April 9, 2021, V-1 and V-2 were interviewed. V-1 and V-2 stated that during their communications TARGET ACCOUNT #1 sent them sexually explicit videos of a female and requested sexually explicit videos from them. V-1 and V-2 sent the requested videos to TARGET ACCOUNT #1 via Instagram. Subsequently, TARGET ACCOUNT #1 threatened to upload their sexually explicit videos online if they refused to send additional sexually explicit photos or videos of themselves. V-1 and V-2 stated they complied and sent additional sexually explicit videos to TARGET ACCOUNT #1.

18. On April 9, 2021, HSI served a summons request to Frontier Airlines Inc. for travel information for Ryan ORTIZ-Perez with complete DOB (YOB 2001).

19. Frontier provided the following flight information:

Departure Date: 4/12/2021, 10:59pm MT

Departure Station: PHL

Arrival Station: SJU

Passenger: Ryan Ortiz

DOB: (Same DOB)

Email Address: yoriad.123@gmail.com [*similar to the email address linked to the Twitter account mentioned above*]

Other Phone: 856-238-2007 [*the same number as the MSISDN/Identifier provided*

by T-Mobile above]

20. On April 12, 2021, a United States Magistrate Judge issued a search warrant for an iPhone 12 Pro Max cell phone (Serial Number G0PDTVMZ0D3Y) and the person of Ryan Yared ORTIZ Perez.
21. Subsequently, it was revealed ORTIZ Perez departed PHL on 4/11/2021, 10:59pm MT (a day prior to what Frontier initially reported).
22. A specific address in Ponce is listed on ORTIZ Perez' Puerto Rico driver's license records issued on 3/5/2019. ORTIZ Perez reported that he would be spending his quarantine time in Ponce, Puerto Rico as part of the Sara Alert system.
23. On April 22, 2021, HSI served the search warrant for the seizure of an iPhone 12 Pro Max cell phone, Serial Number G0PDTVMZ0D3Y at in Ponce, PR.
24. A search of the device revealed the following accounts:
 - Instagram accounts "jenniferrrluv" and "jennixlux_".
 - Twitter account Jennifer Martinez @GraveyardPerez.
25. A search of the device confirmed the phone number assigned to the cell phone was 856-238-2007.
26. A preliminary search of the device revealed child pornography of V-1, V-2, and of other unidentified male minors contained in the device and/or within chats on TARGET ACCOUNT #1. Chats on TARGET ACCOUNT #1 revealed TARGET ACCOUNT #1 was threatening V-1 and V-2 to upload their sexually explicit material if they refused to produce additional child pornography.

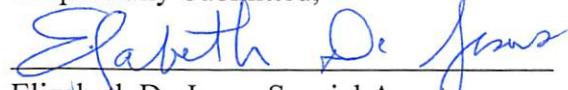
CONCLUSION

27. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that

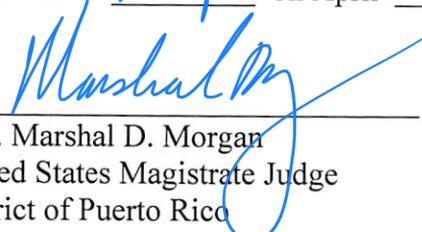
Ryan Yared ORTIZ Perez possessed child pornography in violation of 18 U.S.C. § 2252(a)(4)(B); coerced and enticed a minor to engage in illegal sexual conduct, in violation of 18 U.S.C. § 2422(b); and employed, used, persuaded, induced, enticed and coerced a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct in violation of 18 U.S.C. § 2251(a), or attempted to do so.

28. Therefore, I respectfully request that this Honorable Court issue a Criminal Complaint and Arrest Warrant for **Ryan Yared ORTIZ Perez**.

Respectfully Submitted,


Elizabeth De Jesus, Special Agent
Homeland Security Investigations

Sworn in accordance with the requirements of Federal Rule of Criminal Procedure 4.1 by telephone at 7:40 pm on April 22nd, 2021, in San Juan, Puerto Rico.


Hon. Marshal D. Morgan
United States Magistrate Judge
District of Puerto Rico